

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ERICH ZEEB,

Defendant.

INDICTMENT

_____/

The Grand Jury charges:

COUNT 1

(Sexual Exploitation of a Child)

On or about July 5, 2012, in Marquette County, in the Northern Division of the Western District of Michigan, and elsewhere, the defendant,

ERICH ZEEB,

knowingly employed, used, persuaded, induced, enticed, and coerced a minor to engage in sexually explicit conduct, for the purpose of producing visual depictions of such conduct, including, but not limited to, the videos listed below:

- “fa8fa8106d819d8584ef9a36195d8a9c”
- “2fcbf996898b32829041b9a9f8d40508”
- “c896b5f568c1de8f802bea61f63a6742”

Specifically, the defendant employed, used, persuaded, induced, enticed, and coerced Minor 1, who was 15 years old, to engage in sexually explicit conduct, including genital-genital sexual intercourse and the lascivious exhibition of her genitals. The visual depictions of Minor 1 engaging in sexually explicit conduct were produced using

materials that had been shipped and transported in interstate and foreign commerce, including a Canon PowerShot digital camera and 8GB PNY SD card with identifying number 1QJK397PVASD08G10133BMC2GB17K0R.

18 U.S.C. § 2251(a) and (e)

COUNT 2
(Sexual Exploitation of a Child)

On or about July 7, 2012, in Marquette County, in the Northern Division of the Western District of Michigan, and elsewhere, the defendant,

ERICH ZEEB,

knowingly employed, used, persuaded, induced, enticed, and coerced a minor to engage in sexually explicit conduct, for the purpose of producing visual depictions of such conduct, including, but not limited to, the images and videos listed below:

- “a05d133acb62b88599c9b1dc0d9c5cc4”
- “1c0544b194a56481a03e73f479b415fa”
- “76bd392265853c8b955ebf153536eef5”
- “4d2ee2430da19486ba850cec6f8e28c6”
- “a6969dd436068a8ea3bf04c8a768e458”
- “86a0c4ee6f34d385bddfbad0f81c852f”
- “28c1dba67395018381e01bb4ca50a540”

Specifically, the defendant employed, used, persuaded, induced, enticed, and coerced Minor 1, who was 15 years old, to engage in sexually explicit conduct, including genital-genital and oral-genital sexual intercourse and the lascivious exhibition of her genitals and anus. The visual depictions of Minor 1 engaging in sexually explicit conduct were produced using materials that had been shipped and transported in interstate and foreign commerce, including a Canon PowerShot digital camera and 8GB PNY SD card with identifying number 1QJK397PVASD08G10133BMC2GB17K0R.

18 U.S.C. § 2251(a) and (e)

COUNT 3
(Sexual Exploitation of a Child)

Between on or about July 3, 2012, and on or about July 8, 2012, in Marquette County, in the Northern Division of the Western District of Michigan, and elsewhere, the defendant,

ERICH ZEEB,

knowingly employed, used, persuaded, induced, enticed, and coerced a minor to engage in sexually explicit conduct, for the purpose of producing visual depictions of such conduct, including, but not limited to, the videos listed below:

- “IMG_3623.MOV”
- “IMG_3622.MOV”
- “IMG_3533.MOV”
- “IMG_3536.MOV”
- “IMG_3532.MOV”

Specifically, the defendant employed, used, persuaded, induced, enticed, and coerced Minor 1, who was 15 years old, to engage in sexually explicit conduct, including masturbation and genital-genital and oral-genital sexual intercourse. The visual depictions of Minor 1 engaging in sexually explicit conduct were transmitted using a means and facility of interstate commerce, specifically over the internet, by email.

18 U.S.C. § 2251(a) and (e)

FORFEITURE ALLEGATION
(Sexual Exploitation of a Child)

The allegations contained in Counts 1 through 3 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 2253.

Pursuant to 18 U.S.C. § 2253, upon conviction of the offense(s) in violation of 18 U.S.C. § 2251, the defendant,

ERICH ZEEB,

shall forfeit to the United States of America any visual depiction described in 18 U.S.C. § 2251; any matter which contains any such visual depiction that was produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Chapter 110; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense(s); and any property, real or personal, used or intended to be used to commit or to promote the commission of the offense(s) or any property traceable to such property. The property to be forfeited, as to all counts, includes, but is not limited to a Canon PowerShot digital camera and 8GB PNY SD card with identifying number 1QJK397PVASD08G10133BMC2GB17K0R.

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p) as incorporated by 28 U.S.C. § 2461(c).

18 U.S.C. § 2251

18 U.S.C. § 2253

21 U.S.C. § 853(p)

28 U.S.C. § 2461(c)

A TRUE BILL

[/s/ Redacted]

GRAND JURY FOREPERSON

MARK A. TOTTEN
United States Attorney



HANNA L. RUTKOWSKI
Assistant United States Attorney